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*Plaintiff in Pro Se*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ  
BOLBOL, individually,  
  
PLAINTIFFS.

v.

ROWELL RANCH RODEO, INC.;  
HAYWARD AREA RECREATION AND  
PARK DISTRICT; HAYWARD AREA  
RECREATION AND PARK DISTRICT  
PUBLIC SAFETY MANAGER/RANGER  
KEVIN HART; ALAMEDA COUNTY  
SHERIFF'S OFFICE; ALAMEDA  
COUNTY DEPUTY SHERIFF JOSHUA  
MAYFIELD; and DOES 1 and 2, in their  
individual and official capacities, jointly and  
severally,

DEFENDANTS.

Case No. 3:23-cv-01652-VC

**DECLARATION OF JESSICA L.  
BLOME IN SUPPORT OF  
PLAINTIFFS' JOINT MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Date: August 15, 2024  
Time: 10:00 a.m.  
Judge: Hon. Vince Chhabria  
Courtroom: 5 – 17th Floor

I, Jessica Blome, declare as follows:

1. I am an attorney at law duly licensed to practice before the United States District Court for the Northern District of California, and all the Courts of the State of California. I am a shareholder and partner for Greenfire Law, PC, counsel of record for Declaration of Jessica Blome ISO Plaintiffs' Joint Motion for Partial Summary Judgment (3:23-cv-01652-VC)

1 Plaintiff Deniz Bolbol (Bolbol). If sworn as a witness, I could and would testify to my  
2 personal knowledge of the facts set forth herein. I am submitting this declaration in support of  
3 Plaintiffs' Motion for Summary Judgment. Attached hereto as **Exhibit 22** (000042 – 000050).

4       2.       is a true and correct copy of Defendant Rowell Ranch Rodeo's Responses to  
5 Plaintiff Bolbol's Interrogatories, Set One, dated August 20, 2023. Interrogatory No. 22 asked  
6 Defendant to describe a phone call placed by Rowell Ranch volunteer Gary Houts, and  
7 Interrogatory No. 23 asked to identify the person with whom Houts spoke on the phone call.

8       3.       Plaintiff Bolbol and Plaintiff CuvIELlo were present when Mr. Houts made the  
9 May 20, 2022, call to law enforcement at the Rodeo Park, and the call was captured on video.  
10 Plaintiff CuvIELlo Declaration (CuvIELlo Decl.) ¶ 17, Exh. 7 (000007); Plaintiff Bolbol  
11 Declaration (Bolbol Decl.) ¶15, Exh. 1 (000001). As such, Plaintiff's counsel knew that  
12 Rowell Ranch Rodeo's Interrogatory responses were not true and accurate. *See* Exh. 22 at  
13 Response to Interrogatory No. 23 (Mr. Houts telephone call was made to site boss Brian  
14 Morrison)). On August 22, 2023, Plaintiff worked with counsel to propound discovery to  
15 Defendant County of Alameda Sheriff's Office to confirm the call to law enforcement through  
16 a Request for Production of Documents to Defendant County of Alameda, Set One, dated  
17 August 22, 2023.

18       4.       Attached hereto as **Exhibit 24** (000061 – 000081) is a true and correct copy of  
19 Defendant County of Alameda's Responses to Plaintiff Deniz Bolbol's Interrogatories, Set  
20 One, dated October 27, 2023.

21       5.       Attached hereto as **Exhibit 25** (000082) is a true and correct copy of Defendant  
22 County of Alameda's Responses to Plaintiffs' Requests for Production, Set One, transmittal  
23 letter, dated September 1, 2023. This letter provides a link to Box.com containing body worn  
24 camera videos of Alameda County Sheriff Deputies.

25       6.       Attached hereto as **Exhibit 26** (000083) is a true and correct copy of  
26 Defendant County of Alameda's Responses to Plaintiffs' Requests for Production, Set One,  
27 transmittal letter, dated October 3, 2023. This letter provides a link to Box.com containing  
28

1 additional body worn camera videos of Alameda County Sheriff Deputies. **Exhibits 25** and **26**  
2 include links to videos produced by Defendant County of Alameda.

3 7. On November 22, 2023, five months after her initial request for basic  
4 information about Gary Houts's call with law enforcement on May 20, 2022, Plaintiff Bolbol  
5 served her second set of interrogatories on Defendant Rowell Rodeo. Attached hereto as  
6 **Exhibit 23** is a true and correct copy of Defendant Rowell Ranch Rodeo's Responses to  
7 Plaintiff Bolbol's Interrogatories, Set Two, dated January 5, 2024.

8 8. Attached as **Exhibit 27** (000084) is a true and correct copy of Defendant  
9 County of Alameda's Supplemental Production letter, dated December 20, 2023, producing  
10 the referenced document, ACSO Bates-stamped 00278, Event Register. **Exhibit 27** references  
11 an audio recording of the two telephone calls that Defendant Alameda County Sheriff's Office  
12 states are responsive to Plaintiff's Requests for Production. This includes the call from Mr.  
13 Houts to Sheriff's Office Emergency Dispatch Officer Melissa McMaster on May 20, 2022.  
14 See Exh. 27 at Response to Interrogatory No. 7.

15 9. Attached as **Exhibit 28** (000085) is a true and correct copy of Defendant  
16 County of Alameda's Production letter, dated December 21, 2023, producing as responsive to  
17 Plaintiff's Requests for Production, an audio recording from the Sheriff's Office and a link to  
18 the recording.

19 10. Attached as **Exhibit 29** (000086 – 000107) is a true and correct copy of  
20 Defendant County of Alameda's Updated Responses to Plaintiffs' Interrogatories, Set One,  
21 dated March 15, 2024.

22 11. Attached as **Exhibit 30** (000108 – 000123) is a true and correct copy of  
23 Defendant County of Alameda's Updated Responses to Plaintiffs' Requests for Production,  
24 Sets One and Two, dated March 15, 2024.

25 12. Attached hereto as **Exhibit 31** (000124 – 000135) are true and correct copies  
26 of Defendant Hayward Area Recreation District's Responses to Plaintiffs' Interrogatories, Set  
27 One, dated October 5, 2023. Defendant County of Alameda's Responses to Interrogatory Nos.  
28 5 and 6 reference the Free Speech Area during the 2022 events.

1           13. Attached hereto as **Exhibit 32** (000136 – 000138) are true and correct copies  
2 of Defendant Rowell Ranch Rodeo’s Business Records that Defendant produced to Plaintiffs  
3 during discovery. Exhibit 32 includes Verizon phone records for Rowell Ranch Rodeo  
4 employees Gary Houts and Brian Morrison for the period of April 19, 2022, to May 28, 2022.

5           14. Attached hereto as **Exhibit 33** are true and correct copies of Defendant County  
6 of Alameda’s Business Records that Defendant produced to Plaintiffs during discovery.  
7 **Exhibit 33A** (000139) includes the Event Register for the telephone call from Mr. Houts to  
8 County of Alameda Sheriff’s Office’s Dispatch on May 20, 2022, as produced by Defendant  
9 County of Alameda on September 1, 2023. *See* Exh. 25. **Exhibit 33B** (000140 – 000194) also  
10 includes Defendant County of Alameda’s transcription of videos produced by both County of  
11 Alameda and Plaintiffs as referenced in Exhibit 30, County of Alameda’s Responses to  
12 Requests for Production Nos. 6, 8, and 10.

13           15. Attached hereto as **Exhibit 34** (000195 – 000237) are true and correct copies  
14 of Defendant Hayward Area Recreation District’s business records that Defendant produced  
15 to Plaintiffs during discovery. Exhibit 33, includes documents produced by Defendant  
16 Hayward Area Recreation District in their Responses to Requests for Production, Set One,  
17 dated October 5, 2023, including a November 24, 2014, resolution updating the Rowell Ranch  
18 Rodeo policy of Hayward Area Recreation District’s, Special Events paperwork and Rowell  
19 Rodeo Event Application, Rowell Ranch Rodeo Park, Rodeo Policy, Fees, and Guidelines,  
20 Permit # R6615 for Rowell Ranch Rodeo Association.

21           16. Attached as **Exhibit 35** (000238) is a true and correct copy of Defendants  
22 County of Alameda and Hayward Area Recreation District’s Exhibit 1 to Plaintiff Bolbol’s  
23 deposition, taken March 6, 2024, at Allen, Glaessner, Hazelwood & Werth, LLP, 180  
24 Montgomery Street, Suite 1200, San Francisco, CA 9404. Exhibit 34 depicts the location, but  
25 not the size of the Free Speech Area as it related to the Rodeo Park vehicle entrance, parking  
lots, and rodeo event entrance on May 20 and 21, 2022.

26           17. Attached as **Exhibit 36** (000239) is a true and correct copy of Defendant  
27 County of Alameda’s body worn camera video provided by Alameda County Sheriff

1 Deputies. This video was provided to me by the County of Alameda via Box.com as a  
 2 Response to Plaintiff's Requests for Production, as referenced in Exhibit 25. Sheriff Deputy  
 3 Matthew Laszuk took this body camera video as County of Alameda Deputies initially  
 4 approached and interacted with Plaintiffs upon arrival at the Rodeo Park on May 20, 2022, at  
 5 approximately 5:57 p.m.

6 18. Attached as **Exhibit 37** (000240) is a true and correct copy of Defendant  
 7 County of Alameda's body worn camera video provided by Alameda County Sheriff  
 8 Deputies. This video was provided to me by the County of Alameda via Box.com as a  
 9 Response to Plaintiff's Requests for Production, as referenced in Exhibit 26. Sheriff Deputy  
 10 Joshua Mayfield took this body camera video as he and Defendant Kevin Hart re-approached  
 11 Plaintiffs at the Rodeo Park on May 20, 2022.

12 19. Attached as **Exhibit 38** (000241) is a true and correct copy of Defendant  
 13 County of Alameda's body worn camera video provided by Alameda County Sheriff  
 14 Deputies. This video was provided to me by the County of Alameda via Box.com as a  
 15 Response to Plaintiff's Requests for Production, as referenced in Exhibits 26. Sheriff Deputy  
 16 Joshua Mayfield took this body camera video as he spoke with Defendant Kevin Hart, Rowell  
 17 Ranch Rodeo personnel, and others at the Rodeo Park on May 20, 2022.

18 I make this declaration under penalty of perjury under the laws of the United States of  
 19 America, executed this 3rd day of June, 2024 in Berkeley, California.  
 20

21  
 22 GREENFIRE LAW, PC

23 By: /s/ Jessica L. Blome  
 24 Jessica L. Blome  
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